

Exhibit A

Proposed Order

**[PROPOSED] ORDER DENYING JOINT URGENT  
MOTION OF THE OVERSIGHT BOARD, PREPA, AND AAFAF TO  
EXTEND ALL APPLICABLE DEADLINES TO COBRA ACQUISITIONS LLC'S MOTION  
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIMS**

Upon consideration of the motion filed by The Financial Oversight and Management Board of Puerto Rico (“FOMB”), Puerto Rico Electric Power Authority (“PREPA”), and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF,” collectively the “Movants”), on October 10, 2019 seeking an Order staying litigation relating to Cobra Acquisitions LLC’s (“Cobra”) Motion for Allowance and Payment of Administrative Expense Claims [ECF No. 8789], it is hereby ORDERED that:

1. The motion is **DENIED** as set forth herein.
2. The Court shall hear Cobra’s claims regarding the undisputed claims, totaling \$89,357,178.29 at the October 11, 2019 omnibus hearing.
3. The Court shall hear Cobra’s claims regarding the disputed claims at the October 11, 2019 omnibus hearing to determine whether and to what extent discovery is necessary and the timing of any discovery for the disputed claims.
4. The Court shall hear Cobra’s claims regarding the disputed claims at the January 29, 2020 omnibus hearing.

Dated: October \_\_, 2019

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LAURA TAYLOR SWAIN  
United States District Judge